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March 10, 2020

Hon. Paul A. Engelmayer, United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 1305
New York, New York 10007

Re: Alexandra Canosa v. Harvey Weinstein, et al.
No. 18 Civ. 4115 (PAE)

Dear Judge Engelmayer:

We represent plaintiff, Alexandra Canosa in this matter.

Plaintiff wishes to make an application regarding the timing/manner of depositions in this matter. Alexandra Canosa is due to give birth on (or about) May 5, 2020 in Los Angeles. She is not in a position to fly now and does not know when thereafter she will be available to fly as this is her first child. We therefore request an accommodation from this Court with regard to this issue.

We have requested defense counsels' consent for this application by presenting three potential options for what we could seek permission from the Court for:

1. That Plaintiff's deposition take place in California (such as when a non-party deposition takes place);
2. That Plaintiff's deposition not be scheduled for a period of time after giving birth, while other depositions take place with the current deadline believed to be June 9, 2020;
3. That the deposition deadline, which is currently believed to be June 9, 2020, be extended to September 9, 2020, to accommodate any delays caused by Plaintiff's not being able to fly for a period of time after giving birth.

In response to these potential application possibilities, counsel for the TWC defendants wrote: "we have no objection to postponing Ms. Canosa's deposition indefinitely, which should obviate the need to have her deposition in California, and we have no objection to extending the deposition deadlines generally, until September 9, 2020."

In response, Mr. Weinstein's counsel responded: "no objection".

We therefore request an accommodation in line with what defense counsels have consented to.

In terms of non-party depositions, plaintiff is currently considering taking depositions of the following, in addition to the parties in this matter:

Lauren O'Connor
Dylan Howard
Denise Doyle Chambers
Pamela Lubell
Sallie Hoffmeister
Ronan Farrow
Tom Prince
Lisa Taback
Julie Oh
Kaity Nielson
Sandeep Rehal
Michael Quinn
Roman Khaykin
Igor Ostrovskiy
Seth Freedman
Jack Palladino
Sara Ness
Bob Weinstein
Irwin Reiter

Thank you for your consideration in this matter.

Respectfully submitted,



Jeremy A. Hellman

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Deposition discovery begins on March 25, 2020, 30 days after February 24, 2020, the date of the verdict in defendant Weinstein's criminal case. *See* Dkt. 210 (schedule for deposition discovery). Depositions will last for two and a half months, ending on June 9, 2020. *Id.* The Court orders that plaintiff Canosa's deposition be taken in California, to accommodate her pregnancy.

SO ORDERED.



PAUL A. ENGELMAYER
United States District Judge

March 13, 2020